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June 26, 2006

VIA ELECTRONIC and REGULAR MAIL

Mr. Rusty Fortenberry
Baker, Donelson, Bearman, Caldwell & Berkowitz, PC
4268 I-55 North
Meadowbrook Office Park
Jackson, Mississippi 39211

Re: *Olivia Y. et al. v. Barbour et al.*

Dear Mr. Fortenberry:

I write in anticipation of our upcoming pretrial order submission to let you know that Plaintiffs plan to include on their may call witness list the three persons identified below. These individuals were not previously identified individually in our mandatory disclosures, but are known to MDHS as explained below.

- R [REDACTED] R [REDACTED], [REDACTED]. Seventeen-year old class member who would testify about his conditions of care in MDHS custody.
- E [REDACTED] C [REDACTED], [REDACTED]. Former MDHS foster parent to numerous class members who would testify as to MDHS support of foster care placements.
- Ronnie Crawford, 269 County Road 6100, Baldwyn, MS 38824, (662-365-5153). Former MDHS Regional Director who would testify as to agency management and availability of necessary resources.

Please let me know if Defendants have any objections to these additions and how we might address any concerns you may have.

I am also attaching additional facts from Dr. Steib's report for proposed stipulation, and several corrections to our proposed Exhibit list citations.

Sincerely yours,

Eric Thompson
Eric Thompson
Plaintiffs' counsel

By CR

Encs.

cc: Harold Pizzetta, Esq.
Wayne Drinkwater & Melody McAnally, Bradley Arant
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